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VIA ECF

April 23, 2025

Hon. Lara K. Eshkenazi
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Rosetta Jaisingh v. Synchrony Bank, 1:24-cv-05595-CBA-LKE (EDNY)
Request for Extension of Mediation Deadline and for Clarification and Amendment of March 18, 2025 Order

Judge Eshkenazi:

CAMBA Legal Services, Inc., represents Plaintiff Rosetta Jaisingh in this action and writes to this Court with two requests. Defendant consents to the requests.

First, we request an extension of this Court's deadline to complete mediation. At the parties' request, this Court issued a referral to the EDNY Mediation Program on March 18, directing the parties to select a mediator by April 1, 2025 and complete mediation by May 30, 2025. Plaintiff originally proposed a specific mediator on March 4, 2025, when the parties were initially discussing mediation. Defendant agreed to the proposed mediator on April 1, 2025 and the undersigned immediately reached out to him, but his first availability was June 2. The parties have confirmed this date and will not be able to complete mediation by the original deadline of May 30. We request an extension of the mediation deadline to June 15, 2025, in case additional sessions are necessary, and a corresponding extension of the deadline to file a post-mediation status report.

Second, we request clarification and amendment of this Court's March 18, 2025 Order granting the parties' joint request for an extension of the discovery deadlines. In our joint motion of March 11, 2025, we listed the then-outstanding deadlines (as set forth by the Court in a November 19, 2024 Order) and requested a 6-week extension of those deadlines. We did not set out the proposed new deadlines, which was our oversight. Subsequently, this Court issued a short order granting the motion and adopted our proposed discovery plan. However, the deadlines set forth in the short order appear to be the original deadlines.

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In light of the Court's statement that it was "granting" the motion for extension of time, we request that this Court issue a new order implementing revised deadlines. In addition, given the extension of the mediation schedule, the parties further request an extension of the close of fact discovery to September 3, 2025, to coincide with the completion of all discovery. This will not impact the deadlines for dispositive motions or for trial, as the parties intend to conduct any expert discovery concurrently with fact discovery. The new proposed deadlines are as follows:

Task	Original Deadline	New Deadline
Completion of mediation	5/30/2025	6/15/2025
Mediation joint status report	6/6/2025 or one week after the completion of mediation, whichever is earlier	7/5/2025 or one week after the completion of mediation, whichever is earlier
Motion to amend pleadings	3/27/25	5/8/2025
Close of fact discovery	4/28/25	9/3/2025
Affirmative expert reports	5/21/25	7/2/2025
Rebuttal expert reports	6/18/25	7/30/2025
Expert depositions	7/16/25	8/27/2025
Completion of all discovery and status report	7/23/25	9/3/2025
Dispositive motions or joint pretrial order	8/13/25	9/24/2025

We thank you for your consideration of these requests.

Best,

/s/ Divya Subrahmanyam